# Exhibit B



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 8801

Date: 12-01-2024

Due On: 12-01-2024

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
11-01-24	JF	Call with A. Ferot to discuss factual background and key facts to assist in preparing Proposal of Settlement	0.20	350.00	\$70.00
11-01-24	JF	Draft Proposal of Settlement.	0.40	350.00	\$140.00
11-01-24	AF	Communicate with J. Ferolie re: formal offer of judgment and notice of serving offer.	0.20	550.00	\$110.00
11-04-24	AF	Finalize offer of judgment (.6); communicate with MSG team re: same (.1); prepare Answer (1.6).	2.30	550.00	\$1,265.00
11-05-24	AF	Prepare Affirmative Defenses and finalize Answer (1.4); communicate with team re: same (.1); communicate with MSG team re: same (.1); attend call re: Answer and settlement strategy (1.5).	3.10	550.00	\$1,705.00
11-05-24	JAS	Review and revise answer; discussions with A. Ferot re: same, case strategy.	0.50	650.00	\$325.00
11-06-24	LC	Edit, finalzie for filing and file answer with affirmative defenses.	0.60	275.00	\$165.00

11-06-24	AF	Communicate with L. Cohen re: filing of Answer (.1); finalize Answer (.6); communicate with S. Beckley and MSG team re: same (.4).	1.10	550.00	\$605.00
11-07-24	AF	Finalize Offer of Judgment (.3); review caselaw and statutes regarding  (.3); communicate with MSG team re: same (.1).	0.70	550.00	\$385.00
11-07-24	LC	Prepare notice of Proposal for Settlement.	0.30	275.00	\$82.50
11-07-24	JAS	Telephone call with A. Ferot re: offer of judgment; emails re: same.	0.30	650.00	\$195.00
11-12-24	AF	Communicate with E. Ayala re: extension of deadline to respond to discovery.	0.10	550.00	\$55.00
11-13-24	AF	Communicate with MSG team re: settlement (.1); research the issue of 5);	0.60	550.00	\$330.00
11-14-24	AF	Communicate with MSG team re:  (.3); prepare informal offer of settlement for opposing counsel (.1).	0.40	550.00	\$220.00
11-15-24	AF	Send settlement proposal to opposing counsel (.1); communicate with J. Shore re: status of case (.1).	0.30	550.00	\$165.00
11-19-24	LC	Prepare draft responses to RFP, RFA and ROG.	1.80	275.00	\$495.00
11-19-24	AF	Communicate with MSG team re: settlement offer (.1); review upcoming deadlines (.1); communicate with M. Sheehan re: proposal for settlement (.3); attend meeting with MSG team and J. Ferolie to discuss potential settlements and upcoming discovery responses (.8).	1.30	550.00	\$715.00
11-20-24	JF	Draft responses to Plaintiff's First Set of Requests for Admissions with A. Ferot.	0.30	350.00	\$105.00
11-20-24	JF	Draft responses to Plaintiff's First Set of Interrogatories.	0.60	350.00	\$210.00
11-20-24	JF	Draft responses to Plaintiff's First Set of Requests for Production.	0.80	350.00	\$280.00

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Date	Paymer	nt Method	N	ō	Amount
			Expe	nses Subto	otal: \$650.00
11-08-24	AXS	Upchurch Watson White & Max Invoice 7773768	1.00	650.00	\$650.00
Expenses			Service	s Subtotal	: \$10,885.00
11-29-24	AF	Prepare RFPs (1.6); review applicable rules for Requests for Admission (.3); review and revise response to Request for Admissions (.2).	2.10	550.00	\$1,155.00
11-29-24	AF	Review offer and and upcoming deadlines (.1); communicate with MSG team re: Griffin counteroffer and strategy (.1).	0.20	550.00	\$110.00
11-25-24	AF	Finalize Proposal for Settlement and Notice of Serving Proposal based on MSG team communication.	0.50	550.00	\$275.00
11-25-24	LC	Confer with A. Ferot re service and filing of the settlement offer (0.1); edit and finalzie for service Confidential Settlement Offer and the notice (0.3); serve Confidential Settlement Offer (0.2); file notice of serving with the court (0.3).	0.90	275.00	\$247.50
11-21-24	JF	Research practical law guidance regarding responses to requests for admissions and revise Draft of Responses to Plaintiff's Requests for Admissions accordingly.	0.90	350.00	\$315.00
11-21-24	AF	Review document sent by S. Beckley (.2); attend conference call (.7).	0.90	550.00	\$495.00
11-20-24	AF	Work with J. Ferolie re: discovery responses (.2); communicate with S. Beckley re: settlement strategy (.5).	0.70	550.00	\$385.00
11-20-24	JF	Meeting with A. Ferot and MSG team to discuss potential settlements and upcoming discovery responses.	0.80	350.00	\$280.00

01-15-25 Payment from Retainer, Check, Received on 01-15-25

FULL REFERENCE #:20250115B 1Q8021C018 193 \$11,535.00

\$11,535.00	Subtotal
\$11,535.00	Total
\$11,535.00	Payment
\$0.00	Balance Owing

#### **Detailed Statement Account Summary**

Previous Balance:	\$9,087.50	
New Charges:	\$11,535.00	
Payments Applied:	\$20,622.50	
Payment Date	Invoice No	Amount
12-31-24	8642	\$4,052.50
12-31-24	8678	\$605.00
12-31-24	8706	\$395.00
12-31-24	8758	\$4,035.00
01-15-25	8801	\$11,535.00
Total Amount Outstanding:	\$0.00	

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

\*Invoices Are Due Upon Receipt\*



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 8862

Date: 01-01-2025

Due On: 01-01-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
12-01-24	AF	Review and revise Response to RFA (.7); review and revise Response to Interrogatorries (.8); review and revise Response to RFPs (1.6); communicate with J. Ferolie re: MSG's discovery request (.1).	3.20	550.00	\$1,760.00
12-01-24	JF	Review and revise draft of Defendants' First Set of Requests for Production to Plaintiff.	0.30	350.00	\$105.00
12-02-24	AF	Send discovery responses to MSG team.	0.10	550.00	\$55.00
12-02-24	AF	Attend zoom meeting with MSG team re: discovery and strategy.	0.70	550.00	\$385.00
12-04-24	AF	Attend call re: discovery responses (1.2); communicate with Everlaw re: agreement for database (.1).	1.30	550.00	\$715.00
12-04-24	AF	Review Everlaw Agreement (.1); negotiate discount with Everlaw (.1).	0.20	550.00	\$110.00

12-06-24	AF	Download pst file, compress data, upload onto database with Everlaw support team, and review for technical issues (.5); set up Everlaw database, including by opening project, inviting new users, creating codes, and coding rules, and setting up the parameters (.3); communicate with J. Shore re: Requests for Admissions and Interrogatories (.2).	1.00	550.00	\$550.00
12-07-24	AF	Incorporate J. Shore's comments in the discovery responses (.3); review, analyze, code, redact 800 documents and prepare for production (3.6).	3.90	550.00	\$2,145.00
12-07-24	JAS	Review and revise discovery responses; telephone call with A. Ferot re: same.	0.50	650.00	\$325.00
12-07-24	AF	review, analyze, code, redact 200 documents and prepare for production (.5); communicate with team re: evidence (.1).	0.60	550.00	\$330.00
12-09-24	AF	Revise responses to RFPs (.5); finalize all responses (.8); serve responses (.1); communicate with MSG team re: data collection (.1).	1.50	550.00	\$825.00
12-09-24	AF	Revise discovery responses to include J. Gutchess comments and edits (.3); attend call with MSG team (1); coordinate verification of Response to INterrogatories (.2).	1.50	550.00	\$825.00
12-11-24	AF	Finalize First RFP (.2); communicate with MSG team re: same (.1); incorporate MSG's team edits (.1); serve RFPs (.1); upload new pst file onto system and upload onto Everlaw (.3); review, analyze, code, redact documents for production (1).	1.80	550.00	\$990.00
12-12-24	JF	Call with A. Ferot to discuss document review protocol and applicable tags.	0.40	350.00	\$140.00
12-12-24	AF	Review, analyze, code, redact and prepare documents for production (1); communicate with J. Ferolie re: document review (.4).	1.40	550.00	\$770.00
12-13-24	JF	Review Defendants' Responses to First Set of Requests for Production to assist in preparing for document review.	0.30	350.00	\$105.00
12-13-24	JF	Document review to assist in preparing production to Plaintiff.	3.30	350.00	\$1,155.00
12-16-24	AF	Prepare documents for discovery status hearing.	0.20	550.00	\$110.00

12-17-24	AF	Prepare for hearing (.3); attend hearing (.5); communicate with MSGM team re: same (.1).	0.90	550.00	\$495.00
12-20-24	AF	Communicate with E. Maura re: discovery responses.	0.10	550.00	\$55.00
12-23-24	AF	Communicate with J. Ferolie re: data collection (.1); review RFPs to identify all categories of documents needed to be collected and produced (.5); attend meeting with D. Acker, S. Beckley, and J. Ferolie re: data collection (1.2); draft document collection protocol (.8); communicate with MSGM team re: same (.1); review June 21, 2023 email from Griffin to Potter plus its 20 page exhibit to identify documents supporting our case and documents to produce (.8).	3.50	550.00	\$1,925.00
12-23-24	JF	Call with A. Ferot to prepare for upcoming meeting with MSG team and discuss data collection protocol.	0.10	350.00	\$35.00
12-23-24	JF	Review Defendant's responses to Plaintiff's First Set of Requests for Production to assist in preparing for upcoming meeting with MSG Team.	0.30	350.00	\$105.00
12-23-24	JF	Meet with MSG Team and A. Ferot to discuss data collection protocol, remaining documents that need to be gathered, and coordination with IT team to ensure proper collection.	1.20	350.00	\$420.00
12-23-24	JF	Review documents received thus far from clients, code for responsiveness, and add applicable tags to assist in preparing next production.	1.00	350.00	\$350.00
12-23-24	JF	Review list of search terms with A. Ferot to ensure all required information is covered.	0.10	350.00	\$35.00
12-24-24	AF	Communicate wit L. Cohen re: discovery requests (.1); communicate with MSGM team re: pst files (.2); review ESI vendor pricing (.1); communicate with MSGM team re: same (.1); review and analyze hot documents (.2); communicate with J. Ferolie re: same and case strategy (.1).	0.80	550.00	\$440.00
12-24-24	JF	Review first batch of documents received from client, code for responsiveness, and add applicable tags wherever necessary.	2.20	350.00	\$770.00
12-24-24	JF	Gather extremely hot documents, highlight relevant portions, and share with A. Ferot to assist in developing case strategy.	0.20	350.00	\$70.00

12-27-24	AP	Prepare Motion for Extension of time Re Finalize document production.	0.50	275.00	\$137.50
12-27-24	AF	Prepare documents for production (1); review production protocol and batch tag documents (.3); communicate with MSGM team re: pst files (.1); communicate with A. Pacheco re: data collection and Motion for Extension of Time (.3).	1.70	550.00	\$935.00
12-28-24	AF	Run and QC production (.5); serve production on opposing counsel (.1); send production and hot docs to team (.1).	0.70	550.00	\$385.00
12-29-24	AF	Download data collected and upload onto database and troubleshoot issues encountered (.5); communicate with opposing counsel re: extension of time to produce documents (.1).	0.50	550.00	\$275.00
12-30-24	AF	Download and upload data collected (.5); communicate with A. Pacheco re: same ( .1); communicate with S. Beckley re: status of discovery (.2).	0.80	550.00	\$440.00
12-30-24	AP	Communicate with Alice re: ESI.	0.25	275.00	\$68.75
12-30-24	AP	Work on download of documents sent by the client re: production.	0.50	275.00	\$137.50
12-30-24	AF	Communicate with opposing counsel's office re: extension of time to produce documents (.1).	0.10	550.00	\$55.00
12-31-24	AP	Prepare Proposed Order for Motion for Extension of time to File Production.	0.20	275.00	\$55.00
12-31-24	AP	Communicate with Alice Ferot re: Proposed Order for Motion for Extension of time to File Production.	0.10	275.00	\$27.50
12-31-24	AP	File Motion for Extension of time to File Production and Proposed Order.	0.40	275.00	\$110.00
12-31-24	AF	Communicate with opposing counsel re: extension and discovery responses (.1); review Motion for Extension of Time and Proposed Order (.6); communicate with A. Pacheco re: same (.2); communicate with MSGM team re: Order Granting Motion (.1).	1.00	550.00	\$550.00

Services Subtotal: \$19,276.25

Date	Payment Method	No	Amount
02-05-25	Payment from Retainer, Wire Transfer, Received on 02-05-25	FULL REFERENCE #: 20250205000 8P0073465	\$19,276.25

Subtotal	\$19,276.25
Total	\$19,276.25
Payment	\$19,276.25
Balance Owing	\$0.00

### Detailed Statement Account Summary

Previous Balance:	\$20,622.50	
New Charges:	\$19,276.25	
Payments Applied:	\$39,898.75	
Payment Date	Invoice No	Amount
12-31-24	8642	\$4,052.50
12-31-24	8678	\$605.00
12-31-24	8706	\$395.00
12-31-24	8758	\$4,035.00
01-15-25	8801	\$11,535.00
02-05-25	8862	\$19,276.25
Total Amount Outstanding:	\$0.00	

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

\*Invoices Are Due Upon Receipt\*



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 8897

Date: 02-06-2025

Due On: 02-06-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
01-03-25	AF	Communicate with Everlaw support re: pst file upload (.4); finalize Everlaw upload (.3); filter over 27,000 documents by applying key words, reviewing, analyzing, coding, and redacting resulting hits (2.8).	3.50	550.00	\$1,925.00
01-04-25	AF	Continue filtering over 27,000 documents by applying key words, reviewing, analyzing, coding, and redacting resulting hits.	0.50	550.00	\$275.00
01-05-25	AF	Continue filtering over 27,000 documents by applying key words, reviewing, analyzing, coding, and redacting resulting hits (1.8); revise data collection protocol (.2); prepare documents for production (.5); communicate with MSGM team re: production and next steps (.1).	2.60	550.00	\$1,430.00
01-08-25	JF	Review all documents referred to in Defendant's Exhibit and check to see if they have been marked responsive.	1.30	350.00	\$455.00
01-08-25	JF	Call with A. Ferot to discuss document review assignment details.	0.10	350.00	\$35.00
01-09-25	JF	Prepare for upcoming status call with MSG team.	0.10	350.00	\$35.00

01-09-25	JF	Status call with A. Ferot and MSG team to discuss upcoming depositions, further document collection, and case strategy.	0.60	350.00	\$210.00
01-09-25	AF	Review Scheduling Order and discovery analytics for status call (.2); attend status call (.6); communicate with MSGM team re: damages and production (.1).	0.90	550.00	\$495.00
01-10-25	AF	Communicate with MSGM team re: production (.1); start reviewing discovery responses (.2).	0.30	550.00	\$165.00
01-12-25	AF	Review status of case and Court's Discovery Procedures Order (.2); communicate with opposing counsel re: discovery hearing and meet and confer (.1); review and analyze Plaintiff's Responses to RFPs (.2); review and analyze Plaintiff's production (.8); prepare meet and confer (.5); communicate with MSHM team re: Plaintiff's discovery responses (.2).	2.00	550.00	\$1,100.00
01-13-25	AF	Download new data set and upload onto database (.2); review, analyze, deduplicate, code, redact and prepare for production new data set (1.5); prepare production of documents (.5); serve production (.1); send same to MSGM team (.1).	2.40	550.00	\$1,320.00
01-14-25	AF	Multiple communications with opposing counsel's office re: meet and confer (.2); prepare meet and confer (.2); meet and confer with E. Ayala (.7); communicate via email with E. Ayala re: deposition dates, hearing dates, extension of pretrial deadlines and Griffin's production deficiencies (.2).	1.30	550.00	\$715.00
01-15-25	LC	Attend to email exchange re scheduling of the hearing (0.1); review email from chambers setting discovery hearing and docket same (0.3).	0.40	275.00	\$110.00
01-15-25	AF	Communicate with Chambers re: hearing (.1); work on deposition schedule (.3); communicate with J. Ferolie re: schedule and next steps (.4); communicate with S. Beckley re: same (.2); review and analyze Plaintiff's counsel discovery communications and respond to same (.3); start working on Discovery Hearing (.5); communicate with MSGM team re: hearing (.1).	1.90	550.00	\$1,045.00
01-16-25	LC	Finalize notice and exhibits and file notice of hearing with the court.	1.60	275.00	\$440.00

01-16-25	AF	Prepare Amended Responses to RFPs (.8); communicate with MSGM team re: hearing (.1); communicate with opposing counsel re: resolution of discovery disputes (.1); communicate with L. Cohen re: submission to the Court for hearing (.1); serve Amended responses (.1); send same to MSGM team (.1).	1.30	550.00	\$715.00
01-16-25	LC	Review email chain re depo scheduling and prepare notice of deposition.	0.50	275.00	\$137.50
01-16-25	LC	Review judge's directions and prepare draft notice of hearing and proposed order.	0.80	275.00	\$220.00
01-16-25	AF	Prepare Notice of hearing; with accompanying Proposed Order, supporting documents and caselaw.	2.50	550.00	\$1,375.00
01-17-25	AF	Communicate with A. Pacheco re: depositions (.1); communicate with opposing counsel re: discovery and hearing (.1); review and revise Notice of deposition (.3); serve same (.1); review areas of deposition (.1); send same to MSGM team (.1).	0.80	550.00	\$440.00
01-17-25	AP	Review filings filed on the docket, save and organize them in our system, and calendar deadlines.	0.20	275.00	\$55.00
01-20-25	AF	Communicate with opposing counsel re: his failure to properly meet and confer and inappropriate deposition notice.	0.10	550.00	\$55.00
01-21-25	AP	Create and send the Zoom link to Alice Ferot.	0.10	275.00	\$27.50
01-21-25	AF	Prepare meet and confer in advance of hearing (.4); meet and confer with opposing counsel (.4).	0.80	550.00	\$440.00
01-21-25	AP	Confer with Alice Ferot regarding depositions. (0.2) Coordinate deposition with Court Reporter's services.(0.2) Create a Zoom link for the meeting regarding deposition preparation and send the invitation.(0.1) Review calendar and create calendar invites for meetings and depositions. (0.2)	0.70	275.00	\$192.50
01-21-25	AF	Communicate with J. Ferolie re: chronology of hot docs for MSGM depo prep.	0.10	550.00	\$55.00
01-21-25	JF	Call with A. Ferot to discuss preparation needed for upcoming deposition of MSG Corporate Representative.	0.10	350.00	\$35.00

01-22-25	AF	Research the issue of plaintiff's deposition location and related consequences.	1.00	550.00	\$550.00
01-22-25	AP	Edit the calendar invite for Zachary Griffin's deposition and send the Zoom link for it.	0.10	275.00	\$27.50
01-22-25	JF	Call with A. Ferot to discuss upcoming depositions and case strategy.	0.10	350.00	\$35.00
01-22-25	AF	Communicate with J. Gutchess re: Griffin's deposition (.1); communicate with opposing counsel re: same (.1); communicate with J. Ferolie re: amending the deadlines and depositions (.2).	0.40	550.00	\$220.00
01-23-25	AF	Communicate with J. Ferolie re: hot documents and locate same.	0.20	550.00	\$110.00
01-23-25	AF	Prepare deposition memorandum (1.1); review facts of the case (.3); communicate with MSGM team restatus and depositions (.1).	1.50	550.00	\$825.00
01-23-25	AF	Communicate with A. Pacheco re: hearing binder (.1); communicate with J. Gutchess re: plaintiff's deposition (.1); research the issue of in person deposition (1.8); review and revise Notice of Deposition (.2).	2.20	550.00	\$1,210.00
01-23-25	AP	Prepare and send Notice of In-Person Deposition of Z. Griffin.	0.30	275.00	\$82.50
01-23-25	AP	Confer with Alice Ferot regarding the assignment.(0.1) Print and organize documents for the hearing on 1/24/25 and deliver them to Alice Ferot.(0.3)	0.40	275.00	\$110.00
01-23-25	AF	Prepare for hearing on both parties' discovery disputes (2.8); locate and print evidence to use at hearing (.2); prepare hearing outline (.5).	3.50	550.00	\$1,925.00
01-23-25	AP	Confer with Alice Ferot regarding the assignment.(0.1) Search for flights from Melbourne, Australia to Miami, Florida, take a screenshot of the American Airlines webpage, and create a PDF with the results. (0.2)	0.30	275.00	\$82.50
01-23-25	JF	Communicate with A. Ferot regarding key evidence chronology assignment.	0.20	350.00	\$70.00

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01-23-25	JF	Review all hot documents in Everlaw database and draft chronology of key evidence.	2.40	350.00	\$840.00
01-23-25	JF	Review Plaintiff's production and add key evidence to draft chronology.	1.60	350.00	\$560.00
01-23-25	JF	Call with A. Ferot to discuss arguments in favor of inperson deposition of Plaintiff.	0.20	350.00	\$70.00
01-24-25	AP	Confer with Jenna (0.1) Retrieve cases for the hearing (0.1)	0.20	275.00	\$55.00
01-24-25	AP	Coordinate a court reporter and videographer for the deposition of Z. Griffin on 1/28/25.	0.20	275.00	\$55.00
01-24-25	AF	Travel to and attend discovery hearing (4.8); communicate with opposing counsel after the hearing on deposition schedule and extension of the deadlines (.2); communicate with S. Buckley re: deposition preparation and hearing (.2); communicate with M. Sheehan re: same (.2).	5.40	550.00	\$2,970.00
01-24-25	AF	Communicate with J. Ferolie re: arguments in support of in-person deposition of plaintiff (.2); communicatew ith J. Shore re: handling of timesensitive request for in person deposition with a Judge not allowing written motions (.3).	0.50	550.00	\$275.00
01-24-25	JF	Call with A. Ferot to discuss collection of case law for upcoming hearing.	0.10	350.00	\$35.00
01-24-25	AP	Review filings filed on the docket, save and organize them in our system, and calendar deadlines.	0.30	275.00	\$82.50
01-27-25	AP	Review filings filed on the docket, save and organize them in our system. Send filing to Alice Ferot.	0.10	275.00	\$27.50
01-27-25	AP	Confer with Alice Ferot Edit meeting.	0.10	275.00	\$27.50
01-28-25	AP	Edit Meeting of Griffin v. Motorsport - Stanley's Depo Prep. Create and send a new link.	0.10	275.00	\$27.50
01-28-25	LC	Confer with A. Ferot re depo cancellation.	0.10	275.00	\$27.50
01-28-25	AP	Review filings filed on the docket, save and organize them in our system, and calendar deadlines.  Page: 5	0.30	275.00	\$82.50

01-28-25	AF	Analyze documents to serve in accordance with Court ore tenus rulings (.2); communicate with MSGM team re: rulings and next steps (.1); communicate with MSGM team re: documents to gather (.1); save data sent by team (.1); communicate with L. Cohen re: rescheduling of deposition (.1); work on the deposition preparation (1.5); attend meeting with S. Beckley and M. Sheehan re: deposition preparation (2); finalize shared folder for S. Beckley (.5).	4.60	550.00	\$2,530.00
01-29-25	AP	Create Zoom link and calendar invite for Alice Ferot.	0.10	275.00	\$27.50
01-29-25	AF	Attend depo preparation of S. Beckley.	1.10	550.00	\$605.00
01-30-25	AF	Review, analyze, code, redact and prepare for production documents in compliance with Jan. 24, 2025 ore tenus order.	0.80	550.00	\$440.00
01-30-25	AF	Communicate with A. Pacheco re: deposition (.2), attend deposition of MSGM corporate representative (2.5).	2.70	550.00	\$1,485.00
01-31-25	AF	Continue to review, analyze, code, redact 4,800 documents and prepare production in compliance with Jan. 24, 2025 ore tenus order (5.3); revise Resposnes to RFPs (1.3); process production (.3); serve production and discovery response (.2); send same to MSGM team (.1).	7.20	550.00	\$3,960.00
01-31-25	AP	Organize and save documents of 2025 01 30 MSGM deposition.	0.20	275.00	\$55.00
01-31-25	AF	Communicate with MSGM team re: production of documents (.1); upload data sets onto database and code same (.2).	0.30	550.00	\$165.00
01-31-25	AF	Communicate with team re: transcripts and exhibits.	0.10	550.00	\$55.00
			Service	s Subtotal	: \$33,207.50

Date	Payment Method	No	Amount
02-26-25	Payment from Retainer, Wire Transfer, Received on 02-25-25	REFERENCE #:2025022500 08P0113169	\$33,207.50

Subtotal	\$33,207.50
Total	\$33,207.50
Payment	\$33,207.50
Balance Owing	\$0.00

#### **Detailed Statement Account Summary**

Previous Balance:	\$30,811.25	
New Charges:	\$33,207.50	
Payments Applied:	\$64,018.75	
Payment Date	Invoice No	Amount
01-15-25	8801	\$11,535.00
02-05-25	8862	\$19,276.25
02-26-25	8897	\$33,207.50
Total Amount Outstanding:	\$0.00	

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

<sup>\*</sup>Invoices Are Due Upon Receipt\*



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 8944

Date: 03-01-2025

Due On: 03-01-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
02-03-25	AP	Prepare Re-Notice of deposition of Z. Griffin.	0.20	275.00	\$55.00
02-03-25	AF	Communicate with opposing counsel re: deposition (.2); research the issue of deponent designating the exact location of deposition (.3); review and ranalyze Notice of Deposition (.2); serve same to opposing counsel (.1); communicate with MSGM team re: same (.1).	0.90	550.00	\$495.00
02-03-25	AP	Review filings filed on the docket, save and organize them in our system, and calendar deadlines.	0.30	275.00	\$82.50
02-05-25	AP	Review filings on the docket, save and organize them in our system, and calendar deadlines.	0.20	275.00	\$55.00
02-06-25	AF	Communicate with L. Cohen re: deposition location and logictics.	0.10	550.00	\$55.00

02-09-25	AF	Prepare Griffin's deposition outline (3); communicate with E. Maura re: court-ordered reproduction and his violation of the same (.1).	3.10	550.00	\$1,705.00
02-10-25	AF	Prepare deposition outline (2.8); prepare exhibits (2).	4.80	550.00	\$2,640.00
02-10-25	AP	Coordinate court reporter for the deposition of Z. Griffin.	0.20	275.00	\$55.00
02-11-25	AF	Communicate with team re: deposition outline, exhibits and logistics (.1); prepare key points of deposition for J. Gutchess' review (.4).	0.50	550.00	\$275.00
02-11-25	AP	Confer with A. Ferot regarding Z. Griffin's deposition.	0.20	275.00	\$55.00
02-11-25	AP	Follow up with the court reporter to ensure compliance with the judge's order for the deposition.	0.20	275.00	\$55.00
02-11-25	AP	Review and organize the PDFs related to paystubs in chronological order, and print them.	0.90	275.00	\$247.50
02-11-25	AF	Meet with J. Gutchess re: deposition (.2); incorporate comments from J. Gutchess into outline and finalize same (1.4); communicate with A. Pacheco re: printing, combining, and renumbering exhibits (.2); prepare for deposition (2); communicate with A. Pacheco re: status of exhibits (.1).	3.90	550.00	\$2,145.00
02-11-25	AP	Assist in the preparation for Z. Griffin's deposition.	3.80	275.00	\$1,045.00
02-11-25	JG	Review depo outline, confer with A. Ferot and make a couple of suggestions re: strategy.	0.50	850.00	\$425.00
02-12-25	AP	Assist the court reporter and videographer with setting up in the office.	0.20	275.00	\$55.00
02-12-25	AP	Assist with deposition prep.	0.40	275.00	\$110.00
02-12-25	AF	Prepare for and take deposition of Z. Griffin.	6.50	550.00	\$3,575.00
		Page: 2			

Page: 2

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02-12-25	JF	Call with A. Ferot to debrief today's deposition of Z. Griffin and discuss overall case strategy.	0.20	350.00	\$70.00
02-12-25	JG	Confer with A. Ferot re: Griffin deposition questions and strategy.	0.30	850.00	\$255.00
02-14-25	LC	Confer with A. Ferot re deposition transcript.	0.10	275.00	\$27.50
02-14-25	AF	Communicate with L. Cohen re: transcripts and video services.	0.10	550.00	\$55.00
02-18-25	AF	Communicate with L. Cohen re: court filings (.2); review and analyze Court Order (.3); prepare bates-range designations as per Court Order (.2); prepare Response to Audit Letter (.5).	1.20	550.00	\$660.00
02-18-25	LC	Confer with A. Ferot re oral motions docket entries.	0.20	275.00	\$55.00
02-19-25	AF	Finalize letter re: audit (.3); review MSGM Letter (.2); send Letter to J. Gutchess and S. Beckley (.1); revise Letter (.1).	0.70	550.00	\$385.00
02-19-25	AP	Process the transcript of Z. Griffin's deposition, organize them, and save them.	0.30	275.00	\$82.50
02-20-25	AF	Finalize and execute Audit Response (.1); send same to Auditors (.1).	0.20	550.00	\$110.00
02-25-25	AF	Revise bates-range excel sheet as per the Court Order (.1); send spreadsheet to opposing counsel (.1); review transcript of deposition (.3).	0.50	550.00	\$275.00
02-25-25	AP	Scan and prepare the documents for Alice Ferot.	0.30	275.00	\$82.50
02-26-25	AF	Communicate with J. Shore re: arguments in support of Motion for Summary Judgment following the deposition.	0.30	550.00	\$165.00
02-26-25	JAS	Telephone call with A. Ferot re: case status, scheduling, and strategy.	0.30	650.00	\$195.00
02-28-25	AF	Communicate with Court Reporter re: transcripts.  Page: 3	0.10	550.00	\$55.00

Services Subtotal: \$15,602.50

Expenses
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02-20-25	AXS Veritext - Invoice 8095	284 1.00	3702.30 \$3,702.30
02-24-25	AXS Veritext - Invoice 8101	964 1.00	2235.00 \$2,235.00

Expenses Subtotal: \$5,937.30

Date	Payment Method	No	Amount
03-31-25	Payment from Retainer, Wire Transfer, Received on 03-31-25	REFERENCE #: 20250331000 8P0124315	\$21,539.80

Subtotal	\$21,539.80
Total	\$21,539.80
Payment	\$21,539.80
Balance Owing	\$0.00

#### **Detailed Statement Account Summary**

Previous Balance:	\$33,207.50	
New Charges:	\$21,539.80	
Payments Applied:	\$54,747.30	
Payment Date	Invoice No	Amount
02-26-25	8897	\$33,207.50
03-31-25	8944	\$21,539.80
Total Amount Outstanding:	\$0.00	

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

\*Invoices Are Due Upon Receipt\*



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 8975

Date: 04-01-2025

Due On: 04-01-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
03-04-25	LC	Download and save exhibits and deposition transcript to the file.	0.30	275.00	\$82.50
03-08-25	AF	Review Federal Rules, Local Rules, and the Judge's rules re: summary judgment (.5); communicate with team re: same (.1).	0.60	550.00	\$330.00
03-14-25	AF	Communicate with J. Flagg re: Motion for Summary Judgment (.1); communicate with S. Beckley re: same and affidavits (.2).	0.30	550.00	\$165.00
03-15-25	AF	Prepare Statement of Facts.	3.50	550.00	\$1,925.00
03-16-25	AF	Review over 50 exhibits and 200 pages of transcripts in support of Motion for summary judgment (3.5); draft statement of facts (3.2); communicate with J. Flagg re research in support of motion (.1); communicate with team re: Statement of Undisputed Material Facts and strategy (.1).	6.90	550.00	\$3,795.00
03-17-25	AF	Research the issue of (1); communicate with J. Flagg re: status of research (.2); prepare Motion for Summary Judgment (2.5).	3.70	550.00	\$2,035.00

03-17-25	JSF	Research caselaw regarding to defeat summary judgment when they are inconsistent with deposition testimony.	0.50	350.00	\$175.00
03-17-25	JSF	Research caselaw regarding and send email memorandum to Alice regarding same.	1.40	350.00	\$490.00
03-17-25	LC	Begin working on exhibits to MSJ motion.	3.50	275.00	\$962.50
03-17-25	AF	Communicate with J. Shore re: critical evidence, strategy of the case, and each argument in support of summary judgment (1.5); communicate with J. Flagg re additional research assignments (.2).	1.70	550.00	\$935.00
03-17-25	JAS	Review statement of material facts in support of summary judgment (0.2); telephone calls with A. Ferot re: same, summary judgment; case status and strategy (1.5); emails re: same (0.2).	1.90	650.00	\$1,235.00
03-18-25	AF	Prepare Motion for Summary Judgment (2); communicate with team re: same (.1); communicate with J. Shore re: arguments and drafts (.2); communicate with J. Shore re: timeline of events and arguments (.4); review S. Beckley deposition transcript and locate key excerpts (1); continue drafting Motion for Summary Judgment (2.5).	6.20	550.00	\$3,410.00
03-18-25	JSF	Research caselaw regarding statute of frauds issues in employment agreements and requirement for impossibility of performance in under 1 year.	2.40	350.00	\$840.00
03-18-25	JSF	Research caselaw regarding pleadings as admissions of party opponents.	0.40	350.00	\$140.00
03-18-25	JSF	Research caselaw regarding promissory estoppel and lack of reliance element by plaintiff for motion for summary judgment.	1.10	350.00	\$385.00
03-18-25	JAS	Telephone calls with A. Ferot, J. Flagg re: motion for summary judgment, case strategy.	0.80	650.00	\$520.00
03-18-25	JAS	Review and revise motion for summary judgment; research re: same,	3.20	650.00	\$2,080.00
03-19-25	AF	Continue revising Motion for Summary Judgment and Statement of Facts (6.2); communicate with MSGM team re: same (.1).	6.30	550.00	\$3,465.00

03-19-25	AF	Revise Motion for Summary Judgment and Statement of Facts to include M. Sheehan's comments (1); revise the Statement of Facts to meet the required 10-page limit (.5); communicate with J. Shore re: final drafts (.2); coordinate filing of motion, statement and +60 exhibits with L. Cohen to comply with Court's requirements (.5).	2.20	550.00	\$1,210.00
03-19-25	AF	Communicate with L. Cohen re: new exhibits.	0.10	550.00	\$55.00
03-19-25	LC	Prepare exhibits for filing, finalize for filing and file Motion for Summary Judgment and statement of Material Facts.	4.50	275.00	\$1,237.50
03-19-25	JAS	Review motion for summary judgment and statement of facts re: same (0.5); telephone calls with A. Ferot re: same, case status and strategy (0.2).	0.70	650.00	\$455.00
03-20-25	AP	Confer with Alice regarding the redaction of an MSJ exhibit (0.2); call with CM/ECF Hotline (0.1).	0.30	275.00	\$82.50
03-20-25	AP	Prepare Agreed Motion for Extension of Time to Response to MSJ. (0.6); Prepare Notice of Filing exhibits (0.2)	0.80	275.00	\$220.00
03-20-25	LC	Review filing by OC and update same in electronic folder (.2); update docket with MSJ deadlines (.2).	0.40	275.00	\$110.00
03-20-25	AF	Communicate with J. Flag re: Opposition to Motion for Summary Judgment (.1); communicate with team re: deadlines (.1); communicate with J. Shore re: opposition (.1); prepare e-folder for client (.2); communicate with MSGM team re: summary judgment (.1); prepare Index as required by Judge's procedures (.8); revise Notice of Filing (.1); review evidence in support of opposition to Summary Judgment (.5); file Index (.3); prepare Motion for Extension of Time (.5); prepare Proposed Order (.3); send same to opposing counsel (.1).	3.20	550.00	\$1,760.00
03-21-25	AP	File Motion for Extension of Time.	0.50	275.00	\$137.50
03-27-25	AP	Send the upcoming deadlines for the next two weeks, including the case style, case number, and court, to Alice Ferot to draft the motion for an extension of time.	2.00	275.00	\$550.00
03-27-25	AF	Draft Renewed Motion for Extension of Time.	0.50	550.00	\$275.00

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03-30-25	AF	Finalize Renewed Motion for Extension of Time (.3); prepare Proposed Order (.3); file same (.2).	0.80	550.00	\$440.00
03-31-25	LC	Review court order re Motion for Extension re MSJ and update docket accordingly.	0.20	275.00	\$55.00
03-31-25	AF	Review Judge's procedures on Opposition to Motiton for Summary Judgment and Opposition to Statement of Facts (.3); review and analyze Plaintiff's Motion for Summary Judgment (.5).	0.80	550.00	\$440.00

Services Subtotal: \$29,997.50

Date	Payment Method	No	Amount
04-29-25	Payment from Retainer, Wire Transfer, Received on 04-29-25	Reference PA4TF2702G L31XMF	\$29,997.50

Subtotal	\$29,997.50
Total	\$29,997.50
Payment	\$29,997.50
Balance Owing	\$0.00

### Detailed Statement Account Summary

Previous Balance:	\$21,539.80	
New Charges:	\$29,997.50	
Payments Applied:	\$51,537.30	
Payment Date	Invoice No	Amount
03-31-25	8944	\$21,539.80
04-29-25	8975	\$29,997.50
Total Amount Outstanding:	\$0.00	

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

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AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 9021

Date: 05-01-2025

Due On: 05-01-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
04-01-25	AF	Continue working on the Statement of Facts by locating, reviewing and analyzing evidence in support of our opposition to Plaintiff's Motion for Summary Judgment.	2.80	550.00	\$1,540.00
04-01-25	AF	Prepare Response to Statement of Facts.	3.00	550.00	\$1,650.00
04-02-25	AF	Communicate with team re: Opposition to Motion.	0.10	550.00	\$55.00
04-02-25	AP	Prepare a draft of the declaration of Stanley Beckley.	0.90	275.00	\$247.50
04-03-25	JSF	Attend call with A. Ferot regarding Griffin's Motion for Summary Judgment Response.	0.60	350.00	\$210.00
04-03-25	JSF	Research caselaw to support response to Motion for Summary Judgment.	1.70	350.00	\$595.00
04-03-25	AF	Communicate with J. Flagg re: research in support of Motion for Summary Judgment.	0.60	550.00	\$330.00
04-04-25	AF	Prepare Declaration of S. Beckley.	1.20	550.00	\$660.00

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04-04-25	JSF	Call with A. Ferot regarding response to Motion for Summary Judgment research.	0.20	350.00	\$70.00
04-04-25	JSF	Research caselaw regarding to support response to their Motion for Summary Judgment.	0.80	350.00	\$280.00
04-04-25	JAS	Review and revise response re: motion for summary judgment, statement of facts, and declaration re: same.	0.80	650.00	\$520.00
04-04-25	AF	Prepare Opposition to Summary Judgment (13.3); communicate with J. Shore re: same (.2); communicate with L. Cohen re: filings (.2); communicate with J. Flagg re: research (.2); attend call with S. Beckley re: Declaration (.1); file Motion, Statement of Facts in Opposition, and exhibits via CM -ECF (.5); review and save Plaintiff's filings (.1); communicate with MSGM team re: filings (.1).	14.70	550.00	\$8,085.00
04-07-25	AP	Review filings on the docket, save and organize them in our system (.2); calendar deadlines (.21.	0.30	275.00	\$82.50
04-08-25	AF	Communicate with J. Flagg re: research in support of reply.	0.20	550.00	\$110.00
04-08-25	JSF	Confer with A. Ferot regarding preparations of reply in support of our Motion for Summary Judgment.	0.20	350.00	\$70.00
04-09-25	JSF	Review and analyze Griffin's response to our MSJ and research caselaw cited by Griffin.	1.80	350.00	\$630.00
04-09-25	JSF	Review and analyze Griffin's response to our Statement of Facts in preparation for drafting Reply to Motion for Summary Judgment.	0.50	350.00	\$175.00
04-09-25	JSF	Begin drafting Reply to our Motion for Summary Judgment.	2.70	350.00	\$945.00
04-10-25	AF	Review and analyze draft of Reply (.2); research the issue of statute of frauds (.8).	1.00	550.00	\$550.00
04-10-25	AF	Communicate with A. Pacheco re: index (.1); communicate with J. Flagg re: Reply (.1).	0.20	550.00	\$110.00
04-10-25	AP	Prepare and file Notice of Filing Index.	0.50	275.00	\$137.50
04-10-25	JSF	Finalize initial draft Reply to Motion for Summary Judgment. Email to J. Gutchess, J. Shore, and A. Ferot for their review.  Page: 2	2.10	350.00	\$735.00

04-10-25	JSF	Research additional caselaw to cite in support of Reply to Motion for Summary Judgment.	0.90	350.00	\$315.00
04-10-25	AF	Review and analyze Response to MSGM's Motion for Summary Judgment.	0.60	550.00	\$330.00
04-11-25	AF	Research the issue of (.4); communicate with team re: arguments in Reply (.1).	0.50	550.00	\$275.00
04-11-25	JSF	Four telephone calls (0.2, 0.3, 0.2, and 0.1) with Alice to confer regarding the Motion for Summary Judgment Reply, including caselaw, revisions to document, and additional arguments to insert.	0.80	350.00	\$280.00
04-11-25	JSF	Research caselaw regarding to defeat summary judgment.	0.40	350.00	\$140.00
04-11-25	JSF	Research caselaw post-2015 Supreme Court case regarding  (2); send email memorandum to A. Ferot and J. Shore regarding same (.1).	2.10	350.00	\$735.00
04-11-25	AF	2.8); work on the Reply Statement of Facts (3.5); communicate with D. Acker re: factual allegations and declaration (.3); prepare and revise Declaration (.3); work on Reply in Support of Motion for Summary Judgment (2.5); finalize all documents (1.3); file Reply and Statement (.3); send to MSGM team all filings (.1).	9.10	550.00	\$5,005.00
04-17-25	AF	Review two Notices of Unavailability (.2); communicate with A. Pacheco re: filing (.1).	0.30	550.00	\$165.00
04-17-25	AP	Prepare and file Notice of Unavailability for Jeff Gutchess.	0.60	275.00	\$165.00
04-17-25	AP	Prepare and file Notice of Unavailability for Alice Ferot.	0.60	275.00	\$165.00
04-18-25	AO	Update trial date and all trial deadlines per Order received April 16, 2025.	0.70	200.00	\$140.00

Services Subtotal: \$25,502.50

Subtota	\$25,502.50
Tota	\$25,502.50
Paymen	\$0.00
Balance Owing	\$25,502.50

#### **Detailed Statement Account Summary**

 Previous Balance:
 \$29,997.50

 New Charges:
 \$25,502.50

 Payments Applied:
 \$29,997.50

Payment Date Invoice No Amount 04-29-25 8975 \$29,997.50

Total Amount \$25,502.50

Outstanding:

Trust Account Balance \$0.00

Total Matter Balance \$25,502.50

Please make all amounts payable to: AXS LAW Group

\*Invoices Are Due Upon Receipt\*



AXS LAW Group 2121 NW 2nd Avenue, Suite 201 Miami, FL 33127

Invoice #: 9059

Date: 06-01-2025

Due On: 06-01-2025

Primary Client: Motorsport Games, Inc.

Matter Number:1386-0002-Zachary Griffin v. Motorsport Games Inc.

Matter Name: Zachary Griffin v. Motorsport Games

Date	Atty	Description	Quantity	Rate	Total
05-07-25	AF	Review and analyze Order (.3); communicate with MSGM team re: same (.1).	0.40	550.00	\$220.00
05-08-25	AO	Receive, review, and save to client file: Order Granting MSJ.	0.20	200.00	\$40.00
05-12-25	AF	Attend status call with MSGM team.	0.30	550.00	\$165.00
05-14-25	AF	Schedule suspension of ESI database to reduce costs (.1); communicate with A. Pacheco re: Motion to Tax Cost and Motion for Fees (.1); communicate with J. Shore re: deadlines (.1).	0.30	550.00	\$165.00
05-19-25	AF	Communicate with J. Ferolie re: Motion for Fees.	0.10	550.00	\$55.00
05-19-25	JF	Call with A. Ferot to discuss pending assignments/motions to be filed to obtain attorneys fees and costs.	0.10	350.00	\$35.00
05-20-25	JF	Call with A. Ferot to discuss drafting of Motions for Fees and Costs including timing of same.	0.10	350.00	\$35.00

05-20-25	AF	Review and analyze the Federal Rules, Local rules and caselaw re:  (1.8); communicate with team re: same (.2); communicate with J. Shore re: motions deadlines (.1).	2.10	550.00	\$1,155.00
05-20-25	JF	Call with A. Ferot to discuss strategy and deadlines for pending Motions.	0.10	350.00	\$35.00
05-21-25	AO	Calendar deadlines for Fees and Taxable Costs Motions per Alice's email.	0.20	200.00	\$40.00
05-23-25	AF	Communicate with E. Areias re: Motion for Costs and Motion for Fees.	0.30	550.00	\$165.00
05-27-25	AF	Communicate with E. Areaias re: Motion for Fees and Costs via telephone (.2); locate templates and send to E. Areias (.1).	0.30	550.00	\$165.00
05-28-25	AP	Review docket, court filings, and e-service emails to identify court fees in the case (.3); communicate findings to Eva Aerias and Alice Ferot (.2).	0.50	275.00	\$137.50
05-28-25	EA	Emails to A. Ferot and A. Pacheco regarding expenses needed to complete Bill of Cost form (.5); calls with A. Pacheco regarding same (.3); email and call with A. Flesh regarding same (.3); pull expense reports to use for completing form (.4); prepare draft Bill of Costs (1.0).	2.50	200.00	\$500.00
05-29-25	AO	Update Calendar to reflect current case posture (.1); add deadline for appeal to be filed (.1).	0.20	200.00	\$40.00
05-29-25	EA	Prepare Motion to Tax Costs (2); prepare tax Form (.8); telephone call with A. Ferot regarding same (.2).	3.00	200.00	\$600.00

Services Subtotal: \$3,552.50

Subtotal	\$3,552.50
Total	\$3,552.50
Payment	\$0.00
Balance Owing	\$3,552.50

#### **Detailed Statement Account Summary**

Previous Balance: \$25,502.50

New Charges: \$3,552.50

Payments Applied: \$25,502.50

Payment Date Invoice No Amount

05-29-25 9021 \$25,502.50

Total Amount \$3,552.50

Outstanding:

Trust Account Balance \$0.00

Total Matter Balance \$3,552.50

Please make all amounts payable to: AXS LAW Group

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